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June 23, 2020

Hon. Valerie E. Caproni  
United States District Court  
for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

**Re: *MSP Recovery Claims, Series LLC v. AIG Property Casualty Company*,  
Case No. 1:20-cv-02102-VEC (S.D.N.Y.)**

Dear Judge Caproni:

We represent defendant AIG Property Casualty Company (“AIGPCC”) in the above-referenced matter. Pursuant to Rules 2(C) and 3(A) of your Honor’s Individual Rules of Practice, we respectfully write on behalf of all parties to jointly request an adjournment of the Initial Pretrial Conference currently scheduled for June 26, 2020 to July 24, 2020.

Plaintiff MSP Recovery Claims, Series LLC (“Plaintiff”) filed its Complaint in this action on March 10, 2020. On April 2, 2020, the Court issued a Notice of Initial Pretrial Conference setting the Initial Pretrial Conference for June 26, 2020. *See* ECF No. 6. On April 7, 2020, the Court granted AIGPCC’s first request for an extension of time to answer, move against or otherwise respond to the Complaint to June 25, 2020. *See* ECF No. 13. On June 18, 2020, the parties submitted the joint letter and Civil Case Management Plan and Scheduling Order required by the Court’s Notice of Initial Pretrial Conference. *See* ECF No. 14.

The parties respectfully request this brief adjournment of the Initial Pretrial Conference in order to permit the parties additional time to confer regarding the case schedule and a potential agreement to jointly request a stay of discovery pending resolution of AIGPCC’s to-be-filed motion to dismiss the Complaint (and any motions to dismiss any amended complaints filed by Plaintiff) in exchange for an agreement by AIGPCC to promptly commence data matching discovery proposed by Plaintiff if such motions to dismiss are denied, as discussed in the parties’ June 18, 2020 joint letter and Civil Case Management Plan and Scheduling Order. *See* ECF 14 at 3.

This is the parties’ first request for an adjournment of the Initial Pretrial Conference and all parties are available on the requested date. Accordingly, the parties jointly request that the June 26, 2020 Initial Pretrial Conference be adjourned to July 24, 2020.

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Should your Honor require any additional information, please feel free to contact me. We appreciate your consideration in this matter.

Respectfully Submitted,

/s/ Suzanne Jaffe Bloom  
Suzanne Jaffe Bloom

cc: All Counsel of Record (via ECF)

Application GRANTED. The June 26 conference is adjourned and converted to a teleconference at **3:00 P.M. on July 24, 2020**. The parties and all interested members of the public are to attend by calling 1-888-363-4749, using access code 3121171# and security code 2102. All attendees are reminded to mute their phones when not speaking and to identify themselves each time they speak.

The parties are directed to submit revised pre-conference submissions no later than **July 16, 2020**. To the extent that the parties reach an agreement on how discovery should proceed, they should file a stipulation and proposed order. The joint letter should indicate whether the parties believe that the teleconference should proceed as scheduled, or whether the Court can resolve all case management issues on the papers.

SO ORDERED.

Date: 06/23/2020



HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE